

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re LEHMAN BROTHERS SECURITIES  
AND ERISA LITIGATION

This Document Applies To:

*In re Lehman Brothers Equity/Debt  
Securities Litigation, 08-CV-5523 (LAK)*

Case No. 09-MD-2017 (LAK)

ECF CASE

**NOTICE OF LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENTS WITH D&O DEFENDANTS AND SETTLING  
UNDERWRITER DEFENDANTS AND APPROVAL OF PLANS OF ALLOCATION**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's December 15, 2011 Order Concerning Proposed Settlement with the Director and Officer Defendants ("Pretrial Order No. 27") and Order Concerning Proposed Settlement with the Settling Underwriter Defendants ("Pretrial Order No. 28"), and upon the Joint Declaration of David Stickney and David Kessler in Support of (A) Lead Plaintiffs' Motion for Final Approval of Class Action Settlements with D&O Defendants and Settling Underwriter Defendants and Approval of Plans of Allocation and (B) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; the Memorandum of Law in Support of Lead Plaintiffs' Motion for Final Approval of Class Action Settlements with D&O Defendants and Settling Underwriter Defendants and Approval of Plans of Allocation; and all other papers and proceedings herein, Lead Plaintiffs, through their undersigned counsel, will and do hereby move this Court on April 12, 2012 at 4:00 p.m. in the Courtroom of the Honorable Lewis A. Kaplan, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan

United States Courthouse, 500 Pearl Street, Courtroom 12D, New York, New York 10007, or at such other location and time as set by the Court, for entry of Judgments approving the proposed Settlements as fair, reasonable and adequate and for entry of an Order approving the proposed Plans of Allocation as fair and reasonable.

DATED: March 8, 2012

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER  
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/s/ David R. Stickney

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